

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DEWEY R. BOZELLA,

Plaintiff,

V.

**THE COUNTY OF DUTCHESS and
WILLIAM J. O'NEILL,**

Defendants.

No. 10 Civ. 4917 (CS)

**DECLARATION OF CRAIG R. HEEREN IN SUPPORT OF
PLAINTIFF DEWEY R. BOZELLA'S RESPONSE TO THE COUNTY'S OBJECTIONS
TO THE MARCH 13, 2012 DECISION OF MAGISTRATE JUDGE YANTHIS
GRANTING DISCLOSURE OF CASE FILES CONTAINED IN
PLAINTIFF'S AMENDED COMPLAINT**

CRAIG R. HEEREN declares pursuant to 28 U.S.C. § 1746 that:

1. I am an attorney duly admitted to practice in this Court and a Senior Associate at the firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Dewey R. Bozella, Plaintiff in the above-captioned action. I submit this declaration in support of Plaintiff's Response to the County's Objections to the March 13, 2012 Decision of Magistrate Judge Yanthis Granting Disclosure of Case Files Contained in Plaintiff's Amended Complaint.

2. Attached as Exhibit 1 is a true and correct copy of a transcript of a hearing held before Judge Seibel in the Southern District of New York, White Plains Courthouse, dated March 26, 2012.

3. Attached as Exhibit 2 is a true and correct copy of the First Response of Dutchess County and William J. O'Neill to Plaintiff's First Request for Production of Documents, dated December 22, 2010.


4. Attached as Exhibit 3 is a true and correct copy of a transcript of a conference held before Magistrate Judge Yanthis in the Southern District of New York, White Plains Courthouse, dated May 9, 2011.

5. Attached as Exhibit 4 is a true and correct copy of the Defendant's Proposed Response to Plaintiff's Third Set of Requests for Production of Documents Propounded on Defendant County of Dutchess, dated March 5, 2012.

6. Attached as Exhibit 5 is a true and correct copy of a Letter from Peter J. MacDonald to Patrick T. Burke and Michael Burke, dated January 23, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on April 5, 2012.

By: 
Craig R. Heeren
WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, New York 10022
Tel.: 212-230-8800
Fax: 212-230-8888